

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative of the
Estate of Aldo Vera, Sr.,

Plaintiff,

v.

THE REPUBLIC OF CUBA,

Defendant.

12 Civ. 1596 (AKH)

**STIPULATION AND ORDER
AMENDING PROTECTIVE
ORDER**

WHEREAS, on January 14, 2013, the Court entered a Protective Agreement and Order (Dkt No. 24) (the "Protective Order") governing the production and exchange of documents and information given or exchanged by recipients of subpoenas who have joined in that Protective Order;

WHEREAS, the Court has amended the Protective Order from time to time;

WHEREAS, on May 17, 2013, Judge Hellerstein endorsed a stipulation and order (Dkt No. 207, filed May 20, 2013) permitting Judgment Creditor-Intervenor Jeannette Fuller Hausler ("Hausler") to limited intervention in this proceeding;

WHEREAS, on June 12, 2013, Judge Hellerstein granted Judgment Creditor-Intervenors Alfredo Villoldo and Gustavo Villoldo's (collectively, "Villoldo") motion to intervene (Dkt No. 241, filed June 13, 2013);

WHEREAS, pursuant to the Court's directive, Aldo Vera, Jr. ("Vera"), Hausler, and Villoldo (collectively, the "Judgment Creditors") have agreed to work cooperatively in the prosecution of this matter (*see* Dkt No. 280);

WHEREAS, the exchange of information among the Judgment Creditors is necessary to facilitate cooperation in prosecuting this matter;

WHEREAS, the Protective Order provides in paragraph L, that additional parties may agree to be subject to its terms by signing a counterpart thereof and by serving a copy on all parties of record, and filing same with the Court;

WHEREAS, Hausler and Villoldo have agreed to become parties to, and are willing to be bound by, the terms of the Protective Order and Addendum.

NOW, THEREFORE IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the Judgment Creditors, as follows:

1. All provisions of the Protective Order, as previously amended shall remain in full force and effect.
2. Hausler, Villoldo, and their undersigned counsel agree to abide by the terms of the Protective Order as amended.
3. The parties to this Stipulation and Order shall be deemed to have signed a counterpart of the Protective Order as provided in paragraph L thereof and agree that execution of this Stipulation and Order shall have the same force and effect as executing a counterpart of the Protective Order.
4. This stipulation may be executed by facsimile or email, and in counterparts.

[THIS SPACE INTENTIONALLY LEFT BLANK]

IT IS HEREBY STIPULATED AND AGREED:

Dated: August 20, 2013
New York, New York

KOHN, SWIFT, & GRAF, P.C.

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Robert Alan Swift, Esq.
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*Attorneys for Intervenor-Petitioner
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*Attorneys for Intervenor-Petitioner
Jeannette Fuller Hausler*

SO ORDERED:

Dated: August __, 2013
New York, New York

Honorable Alvin K. Hellerstein
United States District Judge

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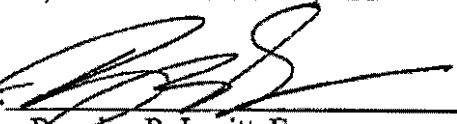
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*Attorneys for Intervenor-Petitioner
Jeannette Fuller Hausler*

*Attorneys for Intervenor-Petitioner
Jeannette Fuller Hausler*

SO ORDERED:

Dated: August __, 2013
New York, New York

Honorable Alvin K. Hellerstein
United States District Judge

IT IS HEREBY STIPULATED AND AGREED:

Dated: August 20, 2013
New York, New York

KOHN, SWIFT, & GRAF, P.C.

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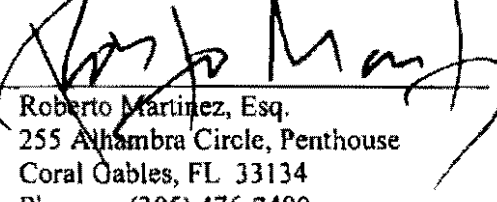
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*Attorneys for Intervenor-Petitioner
Jeannette Fuller Hausler*

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Jeannette Fuller Hausler*

SO ORDERED:

Dated: August 27, 2013
New York, New York

 _____
Honorable Alvin K. Hellerstein
United States District Judge